



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 24, 2017

By Hand and ECF

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Chief Judge Irizarry:

Pursuant to the Court's June 13, 2017 order, the government provides the following report detailing the status of the production of unclassified discovery materials not subject to either (1) the government's filter team review of potentially privileged materials or (2) the March 21, 2017 Protective Order.

Since the government's June 12, 2017 status report, the government has made two additional sets of unclassified, unprivileged disclosures, including the materials from the United States Department of State, the United States Department of Homeland Security, and the Federal Reserve Bank of New York specified in the government's June 12, 2017 status report.

The prosecution team is reviewing, and anticipates continuing to make productions of, unprivileged materials received from the filter team on a rolling basis.

The government anticipates being able to provide the Court with an additional update of the status of unclassified, non-privileged discovery at the Court's next appearance, which is scheduled for September 6, 2017, at 10:00 a.m.

Respectfully submitted,

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